

AO 91 (Rev. 11/11) Criminal Complaint

FILED

UNITED STATES DISTRICT COURT

for the

Western District of Texas

April 11, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: Myrna Gallegos
DEPUTY

United States of America

v.

Louis James McNeil

Case No.

EP-25-MJ-1608-ATB*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 04/09/2025 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section*

Title 21 U.S.C. §952

Offense Description

knowingly and intentionally import into the United States from the Republic of Mexico a quantity of methamphetamine and fentanyl, to wit; approximately 185.49 grams (gross weight) of methamphetamine and 84.47g of fentanyl, both Schedule II Controlled Substances;

This criminal complaint is based on these facts:

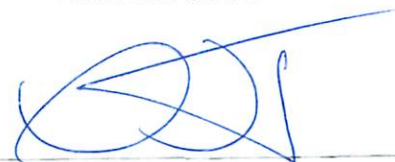
SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.*Complainant's signature*

Marilen Sommers, HSI Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/11/2025*Judge's signature*City and state: El Paso, Texas

Anne T. Berton, U.S. Magistrate Judge

*Printed name and title*Complaint sworn to telephonically on
April 11, 2025 at 01:20 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

Affidavit

On April 9, 2025, at approximately 3:18 p.m., Luis James MCNEIL entered the United States from the Republic of Mexico through the Paso Del Norte (PDN) Port of Entry (POE), in El Paso, Texas, which is within the Western District of Texas. MCNEIL entered the POE via the pedestrian primary lanes pushing a bicycle.

MCNEIL presented a piece of paper with his name, date of birth, and social security number written on it to the primary Customs and Border Protection Officer (CBPO). MCNEIL gave a negative customs declaration for currency, weapons, and contraband. The CBPO observed MCNEIL swaying back and forth and avoiding eye contact. The CBPO also noticed the smell of fresh paint emitting from the bicycle MCNEIL was pushing. The CBPO referred MCNEIL into the Passport Control Secondary (PCS) area for further inspection. Simultaneously, the bicycle was taken to the vehicle inspection area for further inspection.

In the vehicle inspection area, a Canine Enforcement Officer (CEO) was requested to assist with the inspection. A CEO and the assigned Concealed Human Narcotic Detector Dog (CHNDD) conducted a sniff inspection of the bicycle. The CEO notified the CBPOs his canine alerted to the trained odor of narcotics emitting from the bicycle. The VIKEN portable x-ray was used to inspect the vehicle. The operator noticed an anomaly within the bicycle's frame. The bicycle was then walked through the Z-portal x-ray machine by a CBPO. The Z-portal operator confirmed there was an anomaly within the bicycle's frame.

The bottom of the bicycle frame was cut open revealing two bundles. A CBPO conducted field tests of the contraband. One bundle field tested positive for the properties of methamphetamine with a total aggregate weight of 185.49 grams. The second bundle field tested positive for the properties of fentanyl with a total aggregate weight of 84.7 grams.

A Homeland Security Investigation (HSI) Task Force Officer (TFO) and HSI Special Agent (SA) arrived at the POE to investigate the drug smuggling venture. The TFO read MCNEIL his Miranda Warnings out loud in the English language. MCNEIL agreed to speak to agents without the presence of an attorney. The encounter was video, and audio recorded.

MCNEIL stated he knew he was crossing methamphetamine and fentanyl. MCNEIL stated he would be paid with ten percent (10%) of the narcotics in the bicycle and \$100.00 for the drug smuggling venture. MCNEIL admitted this would have been his fourth (4th) time crossing narcotics through the POE via a bicycle and knew it was illegal to do so. MCNEIL stated he needed the money and is currently dealing with a drug addiction. MCNEIL stated he smokes up to 100 pills of fentanyl everyday and is able to smoke 1 gram of fentanyl powder without overdosing.

Because this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.